

REMARKS

I. Introduction

In response to the Office Action dated April 23, 2008, claims 1, 2, 6, 7, 11 and 12 have been amended. Claims 1-15 remain in the application. Re-examination and re-consideration of the application, as amended, is requested.

II. Claim Objections

On page 2, the Office Action objected to the claims as being crowded too closely together.

Applicants' attorney believes that this may be an artifact of the facsimile transmission of the previous response, because the claims in the previous response were spaced at 1.5 lines in the original document. Applicants' attorney also submits this response with the claims spaced at 1.5 lines.

On page 3, the Office Action objected to claims 1, 6 and 11 due to certain informalities.

Applicants' attorney has amended claims 1, 6 and 11 to overcome these objections.

III. Statutory Subject Matter Rejections

On page 3, the Office Action rejected claims 6-10 under 35 U.S.C. §101 as being directed to non-statutory subject matter.

Applicants' attorney has amended claim 6 to overcome the rejections, in the interest of expediting prosecution. Should issues still remain in this regard, Applicants' attorney requests that the Examiner indicate how the rejection can be overcome, in accordance with the directives of the Interim Guidelines for Examination of Patent Applications for Patent Subject Matter Eligibility (Guidelines) II. See also M.P.E.P. §2106. Specifically, should it be necessary, the Applicants' attorney requests that the Examiner identify features of the invention that would render the claimed subject matter statutory if recited in the claim. See Guidelines IV.B. See also M.P.E.P. §2106.

IV. Prior Art Rejections

A. The Office Action Rejections

In paragraphs (6)-(7) of the Office Action, claims 1-2, 5-7, 10-12, and 15 were rejected under 35 U.S.C. §103(a) as being unpatentable over Bonney et al., U.S. Patent No. 6,466,953 (Bonney) in view of Workman et al., U.S. Publication No. 2004/0236754 (Workman). In paragraph (8) of the Office Action, claims 3-4, 8-9, and 13-14 were rejected under 35 U.S.C. §103(a) as being

unpatentable over Bonney in view of Workman and in further view of Haddad, U.S. Publication No. 2002/0111928 (Haddad).

Applicants' attorney respectfully traverses these rejections.

B. The Applicants' Independent Claims

Independent claims 1, 6 and 11 are generally directed to operating a graphics program in a computer. Claim 1 is representative and recites the step of performing one or more functions of a Sheet Set Manager in the graphics program, wherein the Sheet Set Manager manages one or more Sheet Sets, Subsets of the Sheets, and Sheets, each of the Sheet Sets comprises a collection of the Subsets and the Sheets, each of the Subsets comprises a collection of the Sheets, and each of the Sheets comprises a drawing, layout or view, wherein the Sheet Set Manager displays a window that presents a logical structure for the Sheet Sets in a visual form comprising a hierarchical tree representation of the Sheet Set that shows the Subsets and the Sheets contained within the Sheet Sets, as well as the Sheets contained within the Subsets, and wherein the Sheet Set Manager publishes a selected one of the Sheet Sets, including the Subsets and the Sheets of the selected Sheet Set, using a single user-selected operation.

C. The Bonney Reference

Bonney describes an information display device capable of displaying logical display planes includes a first part for storing items of display plane forming information respectively defined for the logical display planes, and a second part for displaying the logical display planes on a screen part in accordance with the items of the display plane forming information, wherein the items of the display plane forming information of logical display planes that have a hierarchical relationship include information describing the hierarchical relationship and commonly own attribute information concerning a component commonly used in the logical display planes having the hierarchical relationship.

D. The Workman Reference

Workman describes a method of maintaining a bidirectional link between data in a file checked-out from a content management system to a user computer and data in at least one file maintained at the content management system is provided. In the method, a first file is scanned at least when it is one of checked in and checked out of the document management system to locate a

link in the file. Information is gathered from the first file regarding a source and target of the link. It is determined if an element in the file is the source or the target. The information is then stored in a database. The information in the database is automatically updated when a second file is corresponding to the other end of the link is checked in to the document management system to reflect changes made to the end of the link in the second file. The changes are applied to the information in the first file.

E. The Haddad Reference

Haddad describes a system for producing and distributing printed documents. The documents to be produced are classified into one or more document sets. The documents, and associated document processing information is then transmitted to a third party for production. The documents may then be delivered to one or more desired recipients. The documents are classified into document sets according to the document processing information, which may include production parameters, such as, format and media requirements like paper size and ink color. The document processing information can also include information relating to the recipients or production parties, such as printing, billing and delivery specifications.

F. Claims 1-2, 5-7, 10-12, and 15 Are Patentable Over the References

1. Independent Claims 1, 6 and 11

The Applicants' invention, as recited in amended independent claims 1, 6 and 11, is patentable over the combination of Bonney and Workman, because it recites a specific combination of elements not shown by the references.

The Office Action, on the other hand, asserts that all the elements of the independent claims are shown in the combination of Bonney and Workman. However, when placed in context, the combination of Bonney and Workman teach something different than Applicants' invention.

a. Bonney does not describe a Sheet Set Manager.

The Office Action asserts that Bonney teaches a CAD program capable of performing the functions of a Sheet Set Manager. At the locations indicated by the Office Action, however, Bonney merely describes drawings generally, where a drawing may include views and may be comprised of multiple sheets.

Consider, the description in Bonney found at the following cited locations:

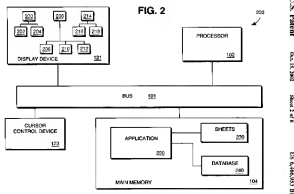
Bonney: Abstract

The invention includes computer instructions that receive an indication of a manipulation of one or more graphical icons by a user, where the graphical icons are interrelated to one another representing a hierarchical relationship among multiple objects of one or more sheets, and the sheets are included within a drawing by a computer aided design (CAD) application program. The computer instructions operate to automatically modify at least sheet order information included within the objects of the one or more sheets reflecting the hierarchical relationship among the multiple objects of one or more sheets based, at least in part, upon the received indication. As a result, hierarchical information on multiple drawing sheets are dynamically updated when a user modifies the hierarchical structure of the drawing sheets by manipulation icons representing the multiple drawing sheets, thereby saving the user effort in tracking the order information and opening each drawing sheet to modify the hierarchical information displayed on the drawing sheets. In one embodiment, the CAD application, including the computer instructions, is embodied in a distribution storage medium.

Bonney: col. 1, lines 26-36

Drawings, in general, may include many details of the models such as, but not limited to, alternative views, section views, detail views of certain aspects of each of the models, and in particular, assembly views to illustrate mating components of each of the models. Because so many aspects of the model(s) may be included within the drawing, the drawing may include many sheets, where each sheet illustrates a certain detail of a model. Depending upon the complexity of designs, a drawing may include numerous sheets showing many details.

Bonney: Fig. 2



However, consider also the following portions of Bonney:

Bonney: col. 4, lines 25-62

As processor 102 executes sequences of instructions that define application 220, sheets 230 can be created, modified and/or deleted. Application 220 further includes sequences of instructions to graphically display and modify a relationship among sheets 230 on display device 121. In one embodiment, a user via cursor control device 123, or other device can manipulate graphical icons representing one or more of sheets 230, as well as other icons.

If, for example, application 220 is a CAD application, icons 202 and 204 can represent sheets stored in main memory 104 that describe in greater detail some component of the sheet corresponding to icon 200. The sheets corresponding to icons 206, 208, 210, 214, 216 and 218 can have similar relationships. Of course, other types of applications that generate objects that can have hierarchical relationships can be used for application 220.

In one embodiment, the relationship between two or more sheets can be manipulated graphically by using cursor control device 123. In the example of FIG. 2, icons 202 and 204 are child objects to icon 200. Similarly, icons 208, 210 and 212 are child objects to icon 206 and icons 216 and 218 are child objects to icon 214. In one embodiment, hierarchical relationships between sheets can be created, modified and/or deleted by dragging and dropping icons displayed on display device 121.

In addition to displaying hierarchical relationships between icons, application 220 can also include information about sheets 230 associated with the corresponding icons. In one embodiment, the information is updated dynamically in response to a user modifying a sheet. For example, various sheets of a drawing can have a revision number associated with the sheet and the icon corresponding to the sheet can include the revision number for display on display device 121. When the revision number is modified for the sheet stored in main memory, the revision number displayed on the icon is automatically updated. Of course, automatic update of information is not limited to revision numbers, part numbers, etc.

The cited portions of Bonney do not describe a Sheet Set Manager that manages one or more Sheet Sets, Subsets of the Sheets, and Sheets, wherein each of the Sheet Sets comprises a collection of the Subsets and the Sheets, each of the Subsets comprises a collection of the Sheets, and each of the Sheets comprises a drawing, layout or view. Moreover, the cited portions of Bonney do not describe a Sheet Set Manager that displays a window that presents a logical structure for the Sheet Sets in a visual form comprising a hierarchical tree representation of the Sheet Set that shows the Subsets and the Sheets contained within the Sheet Sets, as well as the Sheets contained within the Subsets.

Instead, the hierarchical relationship shown in FIG. 2 of Bonney refers only to relationships between sheets, i.e., each icon 200-218 in FIG. 2 is a sheet. For example, icons 200, 206 and 214 are not Sheet Sets or Subsets of Sheets containing their respective Sheets. Instead, icons 200, 206 and 214 are merely Sheets. There is no way to interpret FIG. 2 of Bonney as showing Sheet Sets containing both Subsets and Sheets, or Subsets containing Sheets, except by ignoring the definition

of those terms. Certainly, Bonney itself never refers to Sheet Sets, Subsets, and Sheets, as those terms are defined in Applicants' claims and specification.

b. Workman does not describe a publishing a Sheet Set.

The Office Action admits that Bonney does not teach publishing a Sheet Set, but asserts that Workman does teach these claim elements at paragraphs 5 and 51. These cited portions of Workman are set forth below:

Workman: Paragraph 5

[0005] Any project set of drawings is made up of sheets, in which the various drawings that describe the project. Every drawing has at least two parts to it. The drawing title and the design. A drawing title is an annotation symbol that is part of a drawing and serves to identify that drawing. The drawing title includes such information as the drawing name, drawing number, sheet on which it resides, scale at which it is drawn and sometimes the project. Callouts, defined below, point to the drawing title. The design is the graphics that convey the design intent.

Workman: Paragraph 51

[0051] Maintaining bi-directional links between the link source and the link target allows either end of the link to be reviewed and verified from the other end of the link. For example, a designer can click on a given callout in a drawing. In response to this action, the link from the callout is traced to the target drawing and a rendition of the target drawing is published. Publishing encompasses plotting or printing to hard copy or digital format for review. This is preferably done without exiting the current design session. Options may be provided in the published view of the target drawing to close, redline, or open the drawing for editing. In a similar manner, if a user clicks on a given drawing title (link target), the link from that drawing is traced and a list of all the drawings that point to this drawing as their link target is displayed. Options may be provided in the published view to view any one of the listed drawings, after which the options just mentioned regarding the published view may also be provided. Access to the various functionality can be provided either through tools included in the design program or through a separate interface.

The cited portions of Workman do not describe a Sheet Set Manager that publishes a selected one of the Sheet Sets, including the Subsets and the Sheets of the selected Sheet Set, using a single user-selected operation.

Instead, the cited portions of Workman merely describe publishing as comprising plotting or printing drawings generally, and the publishing of a single target drawing traced from a callout link specifically. Indeed, there is no recognition in Workman of the concept of publishing a selected Sheet Set, including the Subsets and the Sheets of the selected Sheet Set, in a single user-selected

operation, as those terms are defined in Applicants' claims and specification. Moreover, the only "one-click" function described in the cited portions of Workman relates to a user clicking on a given drawing title and then displaying a list of all the drawings that point to this drawing.

2. Dependent Claims 2, 7 and 12

The Applicants' invention, as recited in dependent claims 2, 7 and 12, is patentable over the combination of Bonney and Workman, because it recites a specific combination of elements not shown by the references. Specifically, these claims include the limitations that "the Sheet Set Manager publishes a selection of the Sheets within the published Sheet Set using the single user-selected operation."

The Office Action, on the other hand, asserts that these elements of the dependent claims are shown in paragraph 51 of Workman. However, the cited portions of Workman say nothing about publishing a selection of the Sheets using the single user-selected operation.

Instead, the cited portions of Workman merely refer generally to plotting or printing functions. As mentioned above, the only "one-click" function described in the cited portions of Workman relates to a user clicking on a given drawing title and then displaying a list of all the drawings that point to this drawing.

3. Dependent Claims 5, 10 and 15

The Applicants' invention, as recited in dependent claims 5, 10 and 15, is patentable over the combination of Bonney and Workman, because it recites a specific combination of elements not shown by the references. Specifically, these claims include the limitations that "the Sheet Set Manager includes a plot stamp with each of the Sheets of the published Sheet Set."

The Office Action, on the other hand, asserts that these elements of the dependent claims are shown in paragraph 51 of Workman, which is set forth above. However, the cited portions of Workman say nothing about including a plot stamp with each of the Sheets of a published Sheet Set. Applicants' specification defines a plot stamp as including a time stamp, drawing name, and user name of the individual who last modified the file.

Instead, the cited portions of Workman merely refer generally to plotting or printing functions. There is no reference to a "plot stamp" in the cited portions of Workman.

G. Dependent Claims 3-4, 8-9, and 13-14 Are Patentable Over the References

1. Dependent Claims 3, 8 and 13

The Applicants' invention, as recited in dependent claims 3, 8 and 13, is patentable over the combination of Bonney, Workman and Haddad, because it recites a specific combination of elements not shown by the references. Specifically, these claims include the limitations that "the Sheet Set Manager applies publishing overrides to the published Sheet Set, thereby changing a plurality of publishing properties for the Sheets."

The Office Action, on the other hand, asserts that these elements of the dependent claims are shown in paragraph 91 of Haddad, which is set forth below:

Haddad: Paragraph 91

[0091] The print settings for the document set are illustrated in field 924. These settings may be modified by the selection of the edit settings option button 926. FIG. 9C illustrates a graphical user interface screen for editing print settings for a selected document set, according to one embodiment of the present invention. Various printing and production options can be specified within the editing interface screen 930. Parameters related to the print media are entered by the user in the sheet definition fields 932. Parameters relating to the document format, pen settings, and file format of the documents are specified in the application information fields 934, and parameters relating to final production of the document set is entered in finishing field 936.

However, consider also the following portions of Haddad:

Haddad: Paragraphs 87-88

[0087] In the exemplary embodiments mentioned above, the creation of a print work order may be accomplished by a system of graphical user interfaces representing the main print work order functions. FIG. 9A illustrates a graphical user interface screen for adding or modifying document sets to a print work order, according to one embodiment of the present invention. User interface 900 illustrates the display screen for the document set interface screen 902. The other main function screens are accessed by selecting the appropriate interface tab: 904 for the recipients screen, 906 for the repro company screen, 908 for the billing screen, and 910 for a print work order summary screen.

[0088] The document set screen 902 lists the document sets defined for a particular print work order. Multiple document sets may be included in a single work order, and are listed by name and type in the document set interface window 902. The examples illustrated in FIG. 9A include, architectural half drawings ("arch half") 912, and architectural plans ("arch plans") 914. Both document sets are shown as CAD files. Existing document sets can be removed, edited, or copied through option buttons displayed on document screen 902. A user input function to add document sets 916 to a print work order is also provided in the document set screen 902. The add option button 916 provides access to a database or directory of documents

accessible to the document production program to allow the definition of additional document sets.

Haddad: Paragraphs 92-93

[0092] The document production process includes corresponding graphical user interface screens for the other main processes accessible through the print work order interface screen 900, namely, recipient selection 904, repro company selection 906, and billing 908. FIG. 10 illustrates a graphical user interface screen for defining recipients of a print work order, according to one embodiment of the present invention. The recipient interface screen displays the recipients selected by the user to receive the print work order once it is produced. One or more recipients may be specified. As illustrated in FIG. 10, the recipient interface screen includes a recipient editing feature 1002 that allows the user to enter recipient information, such as name, address, contact information, and so on in a “company details” input field area 1004. The edit recipient function also includes a delivery information input field area 1006 that allows the specification of delivery methods. The document sets that are to be delivered to the recipient are specified in the “document sets to ship” input field area 1008.

[0093] In one embodiment of the present invention, the document sets to be delivered to the specified recipients are produced by one or more repro companies. These repro companies can be third party professional printing or reproduction service companies. Contact information for the repro companies that are available to produce print work orders are provided in a repro company selection interface screen accessed by tab 906 in FIG. 9A. FIG. 11 illustrates a graphical user interface screen 1100 for selecting a reproduction company among a selection of reproduction companies, according to one embodiment of the present invention. As illustrated in FIG. 11, a number of repro companies are listed in a repro company list field area 1102. One or more repro companies can be selected to produce the print work order. The information pertaining to the available repro companies can be modified or added through an editing feature similar to that provided for the recipients, as illustrated in FIG. 10.

The cited portions of Haddad do not refer to applying publishing overrides to the published Sheet Set, thereby changing a plurality of publishing properties for the Sheets, in the context of a Sheet Set Manager publishing a selected Sheet Set, including the Subsets and the Sheets of the selected Sheet Set, using a single user-selected operation.

Instead, the cited portions of Haddad merely refer to setting fields in a print work order, which is then delivered to a reproduction company.

2. Dependent Claims 4, 9 and 14

The Applicants’ invention, as recited in dependent claims 4, 9 and 14, is patentable over the combination of Bonney, Workman and Haddad, because it recites a specific combination of elements not shown by the references. Specifically, these claims include the limitations that “the

Sheet Set Manager allows different elements of the published Sheet Set to be sent to different output devices.”

The Office Action, on the other hand, asserts that these elements of the dependent claims are shown in paragraph 93 of Haddad, which is set forth below:

Haddad: Paragraph 93

[0093] In one embodiment of the present invention, the document sets to be delivered to the specified recipients are produced by one or more repro companies. These repro companies can be third party professional printing or reproduction service companies. Contact information for the repro companies that are available to produce print work orders are provided in a repro company selection interface screen accessed by tab 906 in FIG. 9A. FIG. 11 illustrates a graphical user interface screen 1100 for selecting a reproduction company among a selection of reproduction companies, according to one embodiment of the present invention. As illustrated in FIG. 11, a number of repro companies are listed in a repro company list field area 1102. One or more repro companies can be selected to produce the print work order. The information pertaining to the available repro companies can be modified or added through an editing feature similar to that provided for the recipients, as illustrated in FIG. 10.

The cited portions of Haddad do not refer to different elements of the published Sheet Set being sent to different output devices, in the context of a Sheet Set Manager publishing a selected Sheet Set, using a single user-selected operation.

Instead, the cited portions of Haddad merely refer to sending a print work order to reproduction vendors.

H. Summary.

In summary, Applicants’ attorney submits that independent claims 1, 6 and 11 are allowable over Bonney, Workman and Haddad. Further, dependent claims 2-5, 7-10 and 12-15 are submitted to be allowable over Bonney, Workman and Haddad in the same manner, because they are dependent on independent claims 1, 6 and 11, respectively, and thus contain all the limitations of the independent claims. In addition, dependent claims 2-5, 7-10 and 12-15 recite additional novel elements not shown by Bonney, Workman and Haddad.

V. Conclusion

In view of the above, it is submitted that this application is now in good order for allowance and such allowance is respectfully solicited.

Should the Examiner believe minor matters still remain that can be resolved in a telephone interview, the Examiner is urged to call Applicants' undersigned attorney.

Respectfully submitted,

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